

# CERS2 Document Uploads Policies

*Prepared by Cal/EPA Unified Program Staff August 2011 Update*

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To allow organizations/business to submit all pertinent Unified Program information to their local regulators, CERS2 will support uploading around a dozen different specific types of document uploads (e.g., facility map, Emergency Response Plan, UST Response Plan, etc.). This is needed because an organization may need to provide one or more mandated documents to meet their facility reporting obligations for a program element.

To keep document storage costs low for the State of California and Unified Program fee payers, Cal/EPA is implementing CERS2 using the following document upload limitations/policies. These are based upon both technical needs and policy guidance provided by Unified Program Administration and Advisory Group (UPAAG) and the Unified Program Data Management Steering Committee (DSC).

Unless explicitly stated below, these standards apply to all facility submittals, whether they originate in the CERS2 user interface or in a regulator web portal and are later transmitted to CERS via EDT.

## **File/Data Compression Encouraged**

Organizations are strongly encouraged to minimize the file size of their required documents before they upload them into CERS. Techniques they could use include saving pictures or document scans at lower resolutions (e.g., JPEG, scanned PDFs), and use of ZIP files to compress one or more documents (as long as all zipped documents relate to the specified CERS document upload type (e.g., facility site map).

## **Maximum Single Document Upload Size**

25 MB

A single document upload cannot exceed 25 MB. If an organization needs to upload a document larger than this, they will need to divide it into smaller pieces of <25MB and upload each separately.

## **Acceptable document file extensions/types**

- **Graphics:** .gif, jpeg, jpg, png, svg
- **Generic Text:** txt, rtf, htm, html, csv, xml
- **Documents:** pdf, doc, docx, xls,xlsx, ppt, odt, ods, pptx, zip

Note: Cal/EPA retains the right to reject or delete uploaded documents whose internal format does not match their file extension. Rejection could occur at the time of a document submittal, or may occur post-submittal, in which case the entire submittal element will automatically be found deficient by Cal/EPA and will need to be resubmitted.

## **Locally-Required Document Uploads**

CERS2 will include the ability for an organization to upload one or more locally-required documents specific to a submittal element (e.g., UST, Business Plan, etc.) as requested/required by their local regulator(s). Local regulators should minimize the size and count of any locally-required document uploads.

**Alternate Document Locations**

Organizations will be able to indicate alternate document storage locations for **ALL** document upload types. These alternate locations will include:

- A publicly-available Internet URL,
- Document is stored on-site at the facility,
- Document has been previously provided physically to their local regulator.

If the regulator does not approve of the alternate document location, they would reject the submittal element and direct the business user to resubmit.

**Exempt from Document Requirements**

Organizations will also be able to indicate their belief they are exempt from the document upload requirement. If the regulator does not approve of the document exemption, they would reject the submittal element and direct the organization to resubmit.

**“Malicious” Files**

Organizations are responsible for ensuring their document uploads do not contain viruses or other malicious elements. Cal/EPA retains the right to reject or delete “malicious” uploaded documents. Rejection could occur at the time of a document submittal, or may occur post-submittal. Cal/EPA will **NOT** guarantee organizations or regulators users will be alerted when malicious files are deleted post-submittal.

**Non-Mandated Documents Uploads Not Supported**

CERS2 will only support document uploads for the **specific** documents that must or might be potentially reportable for a facility. This will include support for uploading locally-required document uploads. However, CERS2 is not intended as a repository of non-mandated documents for organizations OR regulators.

**Automated Modification of Document Upload Format**

To reduce storage costs, Cal/EPA reserves the right to modify the size or format of an original document upload providing the modification does not change the actual content. Techniques Cal/EPA may employ could include compressing documents into ZIP files, reducing the resolution of very high-resolution pictures, and or changing the file format of a document upload to a more space efficient format.

**Maximum Total Size for EDT Transaction**

Cal/EPA will communicate to EDT clients the upper limit on the total size of large EDT transactions, which would need to be submitted in ZIP file format. If a regulator web portal received a very large facility submittal with multiple large submittal elements (e.g., a large chemical inventory and a submittal element with one or more large document uploads), the regulator might potentially need to send the large submittal elements as separate EDT transactions.